

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

TINA SOHN

Plaintiff,

v.

**MORGAN STANLEY DW, INC., CARL
CHAPUT AND BEN FIRESTEIN,
Defendants.**

Civil Action No.

04-12348-MLW

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Plaintiff Tina Sohn and defendants, Morgan Stanley DW, Inc., Carl Chaput and Ben Firestein, hereby submit their Joint Statement Pursuant to Local Rule 16.1(D) and the Court's Notice of Scheduling Conference, dated January 10, 2005. The parties are first attempting mediation and as a result, request the following schedule.

I. Discovery Schedule

A. All fact discovery, including written discovery and depositions of fact witnesses, to be completed by December 2, 2005.

B. All written discovery and depositions of expert witnesses to be completed by February 3, 2006.

II. Motion Schedule

All dispositive motions to be filed by March 17, 2006.

III. Trial by Magistrate Judge

The parties do not consent to trial by magistrate judge.

IV. Certifications Signed by Counsel and Parties

The parties will file their respective Local Rule 16.1(D)(3) certifications at the February 3, 2005 scheduling conference.

Tina Sohn,

By her attorney,

Morgan Stanley DW, Inc., Carl

Chaput, and Ben Firestein

By their attorneys,

Jeffrey C. McLucas (BBO #550650)
McLucas & West. P.C.
141 Tremont Street, 4th Fl.
Boston, MA 02111
(617) 338-4242

Jaclyn L. Kugell (BBO # 561622)
Corinne L. Hood (BBO # 654311)
MORGAN, BROWN & JOY, LLP
200 State Street
Boston, Massachusetts 02109
(617) 523-6666

Dated: January ___, 2005